

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF INDIANA  
HAMMOND DIVISION**

<b>In Re:</b>	<b>DEREK S. FARRIS &amp; LESLIE M. FARRIS</b>	)	
		)	<b>Case No: 18-31738</b>
		)	
		)	<b>Chapter 13 Proceeding</b>
		)	
	<b>Debtors.</b>	)	<b>Hon. Judge Harry C. Dees, Jr.</b>

**DEBTORS' RESPONSE TO U.S. BANK TRUST NATIONAL ASSOCIATION'S  
MOTION FOR ORDER CONFIRMING TERMINATION OF THE AUTOMATIC STAY**

COMES NOW the Debtors, by and through Counsel, and for their response to U.S. Bank Trust National Association's Motion for Order Confirming Inapplicability of the Automatic Stay Under 11 U.S.C. §362(c)(4)(A)(1), filed on October 31, 2018 (Doc #19), states the following:

1. U.S. Bank Trust National Association (hereafter USBTNA) has a mortgage lien on the Debtors' residential real estate and homestead located at 57607 Boulder Court, Goshen, IN 46528.
2. The Debtors' homestead real estate located at 57607 Boulder Court, Goshen, IN 46528 is an asset of the Bankruptcy Estate.
3. 57607 Boulder Court, Goshen, IN 46528 is necessary for a successful reorganization of the Debtors' Estate because it is their residence.
4. The last day to file claims in this matter is December 4, 2018. As of the date of this response, USBTNA has not yet filed a proof of claim in this matter.
5. Schedule A of the Debtors' Bankruptcy Petition, shows the real estate at issue having a value of \$219,000.00.

WHEREFORE, Counsel for the Debtors respectfully prays this Honorable Court that in the event that the Court issues an Order that confirms the termination of stay, the Order of the

Court likewise confirms that 57607 Boulder Court, Goshen, IN 46528 remains property of the Estate.

And for all other relief deemed just and proper in the premises.

Respectfully submitted,

Dated: November 15, 2018

/s/Daniel W. Matern  
Daniel W. Matern (#18784-64)  
Attorney for the Debtor  
Law Offices of Moseley & Martinez, LLC  
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Merrillville, IN 46410  
(219) 472-8391

**CERTIFICATE OF SERVICE**

I, THE UNDERSIGNED, HEREBY CERTIFY THAT ON NOVEMBER 15, 2018, SERVICE OF A TRUE AND COMPLETE COPY OF THE ABOVE PLEADING OR PAPER WAS MADE UPON: (**SEE BELOW**) HEREIN ELECTRONICALLY OR BY DEPOSITING THE SAME IN THE UNITED STATES MAIL IN ENVELOPES PROPERLY ADDRESSED AND WITH SUFFICIENT FIRST-CLASS POSTAGE AFFIXED.

Dated: November 15, 2018

/s/Daniel W. Matern  
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